

ZMO LAW PLLC

November 29, 2022

Via ECF and email

Hon. Andrew L. Carter
Southern District of New York
40 Foley Square
New York, NY 10007

RE: *United States of America v. Darnell Feagins*, 20-CR-218 (ALC)

Dear Judge Carter:

This office represents Darnell Feagins in the above-captioned matter. Mr. Feagins would like to enter a guilty plea pursuant to the proposed letter agreement transmitted to Jill Shellow, Esq. dated August 5, 2022 and signed by attorneys for the government.

I understand from AUSA Cecilia Vogel that if Mr. Feagins does not plead prior to December 7, 2022, the government intends to file a superseding indictment at that time which would have the effect of increasing the applicable mandatory minimum sentence from ten years to fifteen years based on the same conduct. Accordingly, we respectfully request that the court schedule a change of plea hearing prior to December 7, 2022. Defense counsel is available any time on December 1 or December 5, 2022, or in the morning on December 2, 2022. I am also available on the morning (but not the afternoon) of December 7, if the plea can be heard prior to the grand jury sitting.

Thank you for your attention to this case.

Very truly yours,

Zachary Margulis-Ohnuma

Zachary Margulis-Ohnuma

CC: AUSA Cecilia Vogel